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The parties are directed to submit via ECF a fully executed copy of the proposed Confidentiality Order for the Court's review and consideration.

SO ORDERED.

Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
October 18, 2023

October 18,

**By ECF**

Hon. Philip M. Halpern, U.S.D.J.  
United States District Court  
Southern District of New York  
Hon. Charles L. Briant Jr. Federal Building and Courthouse  
300 Quarropas Street  
White Plains, New York 10601-4150

**Re: *Wolf, et al. v. Dolgen of New York, LLC***  
**Case No. 7:23-cv-0558-PMH**  
**Proposed Confidentiality Order**

Dear Judge Halpern:

This firm represents Defendant Dolgen of New York, LLC (“Dollar General”) in the above-referenced matter. Enclosed for Your Honor’s review and consideration is a copy of the Court’s Model Confidentiality Agreement and Protective Order, which contains a proposed addition to Paragraph 16 in track change form (Exhibit A). In accordance with your Individual Practice 1.I, Dollar General submits this requested revision to clarify the obligations of persons receiving Confidential material, ensuring that certain industry standards are followed when transmitting material designated Confidential.

If the proposed revision to the Confidentiality Order meets with Your Honor’s approval, the parties respectfully request that a clean copy of the revised Confidentiality Order (Exhibit B) be So Ordered and entered with the Clerk of the Court.

Thank you for your time and consideration of this matter.

Respectfully Submitted,

*/s/ Philip A. Goldstein*

Philip A. Goldstein

PAG:

Enclosures

cc: All Counsel of Record (by ECF)